

RemarksRejections of Claims 1-26 and 31 Under 35 U.S.C. § 102(e)

The Examiner has rejected claims 1-26 and 31 as anticipated under 35 U.S.C. § 102(e) by U.S. patent number 6,307,978 issued to Metaxas (hereinafter referred to as Metaxas). The Applicant does not admit that Metaxas is indeed prior art with respect to the subject application and reserves the option to antedate the reference. Support for the amendments to the claims can be found in Figure 7, Figure 8, and paragraphs 0030 and 0035, as well as elsewhere in the originally filed application. The Applicants respectfully request careful consideration of the following explanations regarding the rejections of claims 1-26 and 31.

Rejection of Claims 1-8 Under 35 U.S.C. § 102(e)

The amended claim 1 includes the limitations of "transferring a first plurality values, corresponding to a first one of a plurality of rows of pixels in a first one of a plurality of segments of pixels included in a group of pixels, **over a first bus** to a first processing device" and "transferring at least one of the first plurality of error terms **over a second bus** to a second processing device, **with the second bus having a lower maximum transfer rate than the first bus**" and ". (emphasis added) The Applicant's representative could not locate subject matter disclosed in Metaxas upon which all of these limitations of the amended claim 1 read. For example in column 4, lines 21-28 of Metaxas it is disclosed that:

A linear array of processors is used in the present embodiment. Each processor is capable of input and output, and can communicate with its left and right neighbors. Suitable hardware may include, for example, a MasPar MP-1101 general purpose parallel computer sold by NeoVista Software of Cupertino, Calif. Other systems may be created by connecting small processors together (e.g., the Intel 286 sold by Intel Corporation of Milpitas, Calif.).

And, in column 4, lines 54-57 of Metaxas it is disclosed that:

The processors P.sub.k-2 -P.sub.k+4 are connected together in a linear array. In certain embodiments, an additional control processor 30 may be employed to direct the operation and timing of the processors P.sub.k-2 -P.sub.k+4

The Applicant respectfully submits that no where in these sections of Metaxas is subject matter disclosed upon which the limitations of "the second bus having a lower maximum transfer rate than the first bus" reads.

As the Applicant knows that the Examiner is well aware from MPEP 2131, "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference" and "[t]he elements must be arranged as required by the claim". The Applicant respectfully submits that for at least the reason that "each and every element as set forth in the claim is" not "found, either expressly or inherently described" in the referenced sections of Metaxas, a valid *prima facie* anticipatory rejection of the amended claim 1 with respect to Metaxas is not present. Accordingly, the Applicant respectfully requests withdrawal of the rejection of claim 1 as anticipated under 35 U.S.C. § 102(e) by Metaxas.

Because each of claims 2-8 is dependent, either directly or indirectly, upon the amended claim 1, they incorporate all of the limitations of the amended claim 1. Therefore claims 2-8 are not anticipated by Metaxas for at least this reason. Accordingly, the Applicant respectfully requests withdrawal of the rejection of claims 2-8 as anticipated under 35 U.S.C. § 102(e) by Metaxas.

Rejections of Claims 9-26 Under 35 U.S.C. § 102(e)

The amended claim 9 includes the limitations of "a first set of values received over a *first bus*" and "a *second bus* arranged for transferring a third set of values, from the halftoning of ones of the first set of values corresponding to the ones of the first set of pixels, to the second processing device and for transferring a fourth set of values, from the halftoning of ones of second set of values corresponding to the ones of the second set of pixels, to the first

processing device, ***with the second bus having a lower maximum transfer rate than the first bus***". (emphasis added) Similar to the explanation provided with respect to the rejection of claim 1, the Applicant respectfully submits that for at least the reason that "each and every element as set forth in the claim is" not "found, either expressly or inherently described" in the referenced sections of Metaxas, a valid *prima facie* anticipatory rejection of the amended claim 9 with respect to Metaxas is not present. Accordingly, the Applicant respectfully requests withdrawal of the rejection of claim 9 as anticipated under 35 U.S.C. § 102(e) by Metaxas.

Because each of claims 10-26 is dependent, either directly or indirectly, upon the amended claim 9, they incorporate all of the limitations of the amended claim 9. Therefore claims 10-26 are not anticipated by Metaxas for at least this reason. Accordingly, the Applicant respectfully requests withdrawal of the rejection of claims 10-26 as anticipated under 35 U.S.C. § 102(e) by Metaxas.

Rejection of Claim 31 Under 35 U.S.C. § 102(e)

The amended claim 31 includes the limitations of "a first set of values ***received over a first bus*** and" and "***a second bus*** arranged to transfer a third set of values, from the halftoning of ones of the first set of values corresponding to the ones of the first set of pixels, to the second means for halftoning and for transferring a fourth set of values, from the halftoning of ones of second set of values corresponding to the ones of the second set of pixels, to the first means for halftoning, ***with the second bus having a lower maximum transfer rate than the first bus***". (emphasis added) Similar to the explanation provided with respect to the rejection of claim 1, the Applicant respectfully submits that for at least the reason that "each and every element as set forth in the claim is" not "found, either expressly or inherently described" in the referenced sections of Metaxas, a valid *prima facie* anticipatory rejection of the amended claim 31 with respect to Metaxas is not present. Accordingly, the Applicant respectfully requests withdrawal of the rejection of claim 31 as anticipated under 35 U.S.C. § 102(e) by Metaxas.

Rejections of Claims 27-28 Under 35 U.S.C. § 103(a)

The Examiner has rejected claims 27 and 28 as obvious under 35 U.S.C. § 103(a) over Metaxas in view of United States patent number 6,870,642 issued to Ostromoukhov, hereinafter referred to as Ostromoukhov. The Applicants respectfully request careful consideration of the following explanations regarding the rejections of claims 27-28.

The amended claim 27 recites the limitations of "a first processing device to receive, over a **first bus**, a first set of values, included in the color values, corresponding to a first set of pixels and to perform halftoning on a the first set of values" and "**a second bus coupling the first processing device and the second processing device** for transferring a third set of values from the halftoning of the ones of the first set of pixels to the second processing device and for transferring a fourth set of values from the halftoning of the ones of the second set of pixels to the first processing device, **with the second bus having a lower maximum transfer rate than the first bus**". (emphasis added)

Similar to the explanation provided with respect to the amended claim 1, the Applicant respectfully submits that the referenced sections of Metaxas do not disclose subject matter upon which the limitations of claim 27 recited above read. The sections of Ostromoukhov cited by the Examiner do not appear to provide these missing limitations.

As the Applicant knows the Examiner is well aware, according to MPEP 2143, one element that must be met to make a valid prima facie obviousness rejection is that "the prior art reference (or references when combined) must teach or **suggest all the claim limitations.**" (emphasis added) Because the sections of Ostromoukhov and Metaxas relied upon by the Examiner in making the rejection of claim 27 do not disclose subject matter upon which all the limitations of the amended claim 27 read, the Applicant submits that a valid prima facie obviousness rejection of the amended claim 27 is not present for at least this reason. Accordingly, the Applicant respectfully requests withdrawal of the rejection of the amended claim 27 under 35 U.S.C. § 103(a).

Claim 28 is dependent upon claim 27 and therefore includes all the limitations of claim 27. Because, the Applicant submits, claim 27 is nonobvious, claim 28 is nonobvious for at least the reason that claim 28 is dependent upon claim 27. Accordingly, the Applicant respectfully requests withdrawal of the rejection of claim 28 under 35 U.S.C. § 103(a).

Allowed Subject Matter

Claims 29 and 30 have been allowed by the Examiner.

Conclusion

The Applicant respectfully submits that the subject application is in a condition for allowance. Allowance is respectfully requested.

Respectfully submitted,

Thomas B. Pritchard

By Gregg W. Wisdom
Gregg W. Wisdom
Reg. No. 40,231

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(360) 212-8052